



July 18, 2016

Leslie Pierce, Program Manager
2016 Water-Energy Grant Program
Department of Water Resources
Sacramento, CA 95814
Sent via electronic mail

Re: Comments on Revised 2016 Water-Energy Grant Program

Dear Ms. Pierce;

Thank you for the opportunity to comment on the revised 2016 Water-Energy Grant Program. We appreciate and support the proposed change, which expands program eligibility to include projects and measures that benefit disadvantaged communities (DACs) but suggest that program eligibility be further expanded to include other water and energy saving investments. It is often difficult for many, if not most, low-income residents to get access to common conservation programs that provide appliance rebates as frequently there isn't discretionary income to purchase new energy efficient appliances. Moreover, many small communities cannot afford to launch their own conservation program without grant assistance. This Program can, if successful, address a built-up need that has not been addressed in past programs. Specifically, we request additional changes to the guidelines that will further prioritize and target investments to residents of DACs and expand eligibility of projects beyond those currently listed in the guidelines.

We strongly recommend a change in language on page 9 of the guidelines where it states "...only the project measures listed below..." to give the applicant more options to apply for residential programs. As is written, applicants looking to do residential projects in DACs can only apply for faucets, showerheads, residential clothes washers, and residential dishwashers.

All which save water and energy, however, as noted in our previous comment letter, 18% of water waste is attributed to leaks. We would like to see the language changed to “...recommended projects listed below...” so as to allow and encourage other methods to save water and energy in DACs and addition of other examples which can provide critical and substantial fiscal, water, and energy benefits.

Adding other options such as indoor plumbing fixes or toilet replacement could save a low income family hundreds, or even thousands of dollars in substantial water and energy reductions. Hundreds of dollars for a low income family can cover their rent, their water, electricity bill, etc. Including these fixes will help conserve much needed water in our continuing time of drought. Similarly, upgrading inefficient and leaking wells, or leaking distribution systems in small, disadvantaged communities can result in substantial savings to community members, increased reliability of water service, and energy savings.

In *Attachment 7. Disadvantaged Communities* we would like to see additional language to ensure awarded grants provide direct benefits to a community and target households in disadvantaged communities. For instance, any project that receives credit for investing in a DAC must be “...located in and benefiting households in DACs....”. Additionally, DWR should assess the extent to which a project provides a direct benefit to disadvantaged community residents, and give greater priority to those projects that provide greater benefits to disadvantaged communities and projects that invest in communities with the greatest need. To that end, DWR should prioritize projects that are 100% located in and benefiting DAC households.

The guidelines should create stronger metrics to ensure investment in DACs, including a set aside for DAC projects and greater prioritization of DAC investments. DWR should give greater weight in a prioritization scheme to the Disadvantaged Community component of a project in comparison to weight given to water savings. For example, a project that provides a benefit to households in DACs but only provides medium GHG savings would rank higher than a project that does not benefit a DAC but has high GHG savings. DWR should also create a set aside so that at least 25% of the grant funding targets projects that benefit households in disadvantaged communities. For those projects that benefit households in both disadvantaged communities and non-disadvantaged communities, only those investments in and benefiting households in disadvantaged communities should count toward the set-aside.

Once again, we appreciate the opportunity to provide comments on these documents. We are content to see residential projects were added to these guidelines, however, we believe there are other good opportunities to make sure vulnerable communities are included. We look forward to working with your staff on further development and implementation of this program.

Sincerely,

Jennifer Clary, Clean Water action

Grecia Elenes, Leadership Counsel for Justice and Accountability

Jessi Snyder, Self-Help Enterprises

Deborah Ores, Community Water Center

Sergio Caranza, Pueblo Unido CDC

Stan Keasling, RCAC